

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GUERLAIN, SOCIÉTÉ PAR ACTIONS SIMPLIFIÉE  
(SAS); GUERLAIN, INC.; HUBLOT SA, GENÈVE;  
KENZO; LVMH FRAGRANCE BRANDS;  
LVMH SWISS MANUFACTURES S.A.; PARFUMS  
CHRISTIAN DIOR; and PRL USA HOLDINGS,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and  
XYZ COMPANIES,

Defendants.

CIVIL ACTION NO.

19 CV 11326 (PGG)

**PRELIMINARY INJUNCTION ORDER**

This action having been commenced by Guerlain, Société Par Actions Simplifiée (SAS) and Guerlain, Inc.; Hublot SA, Genève; Kenzo; LVMH Fragrance Brands; LVMH Swiss Manufactures S.A.; Parfums Christian Dior; and PRL USA Holdings, Inc. (collectively “Plaintiffs”) on December 11, 2019 against Defendants Various John Does, Jane Does, and XYZ Companies, at 211 Canal Street, New York, New York 10013; 224D Canal Street, New York, New York 10013; 259B Canal Street, New York, New York 10013; and 260 Spring Street, Manhattan Mini Storage, 6th Floor, Aisle 9, Room 013, New York, New York 10013, alleging trademark counterfeiting and infringement of Plaintiffs’ Federally Registered Trademarks (defined below) and charging defendants with, *inter alia*, trademark counterfeiting, infringement, dilution and false advertising, and a copy of the Summons, Complaint, Seizure Order, and supporting papers having been served upon the defendants during civil seizures at the following locations on December 17, 2019: Mr. Das Sreekanta at 211 Canal Street, New York, New York 10013; Mr. Mitu Md at 224D Canal Street, New York, New York 10013; 259B Canal Street, New

York, New York 10013; and 260 Spring Street, Manhattan Mini Storage, 6th Floor, Aisle 9, Room 013, New York, New York 10013 (collectively, “Defendants”);

It appearing to the Court that it has jurisdiction over the subject matter of this action, over Plaintiffs and over Defendants;

The Court having considered the Complaint and the exhibit thereto, Plaintiffs’ Order To Show Cause and accompanying papers and the Defendants failing to appear at the hearing on January 16, 2020 after receiving notice of the same on December 17, 2019; and

It further appears that Defendants are, *inter alia*, counterfeiting and infringing Plaintiffs’ Federally Registered Trademarks, in violation of 15 U.S.C. § 1114 and will continue to counterfeit and infringe Plaintiffs’ Federally Registered Trademarks unless restrained by Order of this Court.

Accordingly, the Court concludes as a matter of law:

1. This Court has jurisdiction over the subject matter of all counts of this action and over all the parties hereto;
2. Plaintiffs have established a *prima facie* case of ownership of Plaintiffs’ Federally Registered Trademarks;
3. Plaintiffs are likely to prevail on the merits of this action in showing that Defendants are counterfeiting and infringing Plaintiffs’ Federally Registered Trademarks in violation of 15 U.S.C. § 1114;
4. Defendants’ actions have caused and will continue to cause immediate and irreparable harm, loss, and damage before a full trial on the merits can be held, in that monetary compensation will not afford adequate relief to Plaintiffs for Defendants’ continuing acts of counterfeiting and trademark infringement;

5. The harm to Plaintiffs from the denial of this request for a Preliminary Injunction would outweigh the harm to the legitimate interests of Defendants against whom the Order would be issued and to any third parties; and


6. The public interest would best be served by granting this Preliminary Injunction prior to a full trial on the merits or a default judgment against Defendants.


NOW THEREFORE, it is hereby ORDERED as follows that:

1. The Defendants and their respective principals, officers, agents, servants, employees, and attorneys, and all persons in concert and participation with them are hereby restrained and enjoined, pending termination of this action:


(a) From using Plaintiffs' Federally Registered Trademarks, including but not limited to:

**GUERLAIN SOCIÉTÉ PAR ACTIONS SIMPLIFIÉE (SAS) & GUERLAIN, INC.**




<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
<b>GUERLAIN</b>	3	Perfumes, eau de cologne, toilet waters, face cream; face, talcum, and bath powders, loose and in compact form	Dec. 30, 1924	193391	Guerlain, Inc. (NY)
<b>SHALIMAR</b>	3	Perfumes	Aug. 24, 1926	216906	Guerlain, Inc. (NY)
L'HEURE BLEUE	3	Perfumes and toilet water	Mar. 6, 1945	412381	Guerlain, Inc. (NY)
APRES L'ONDEE	3	Toilet water	Mar. 6, 1945	412388	Guerlain, Inc. (NY)
MITSOUKO	3	Perfumes and toilet waters	Mar. 6, 1945	412390	Guerlain, Inc. (NY)
	3	Perfume	Dec. 16, 1975	1027122	Guerlain, Inc. (NY)


<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
	3	Toiletries-namely, perfume, eau de toilette, eau de cologne, eau de parfum, toilet soap	Apr. 16, 1985	1330436	Guerlain, Inc. (NY)
<b>JARDINS DE BAGATELLE</b>	3	Toilet water	Apr. 22, 1986	1390453	Guerlain, Inc. (NY)
<b>SAMSARA</b>		Perfumes, perfume de toilette, eau de toilette, body lotion, body shampoo, and skin creams	July 3, 1990	1604258	Guerlain, Inc. (NY)
<b>HERITAGE</b>	3	Eau de toilette, personal deodorant	Dec. 13, 1994	1867402	Guerlain, Inc. (NY)
<b>GUERLAIN</b>	3, 4, & 21	Perfume; eau de toilette; eau de cologne; eau de parfum; eau de senteur (alcohol-free toilet water); parfum de toilette; body shampoo; bath oil; skin cleansing cream; wrinkle removing skin care preparations; skin moisturizer; skin conditioner; skin cream; night cream; body lotion; body milk; bronzing cream; bronzing powder; make-up; foundation make-up; make-up remover; eye shadow; eye-liner; under eye concealer; mascara; eye make-up remover; face powder; lipstick; protective base coat for nails; nail polish; after-shave lotion; after-shave balm; shaving cream; personal deodorant; sun screen preparations; scented talcum powder in class 3  Scented candles in class 4  Cosmetic brushes in class 21	Dec. 19, 1995	1942534	Guerlain (France SAS)
<b>AQUA ALLEGORIA</b>	3	Cologne	Aug. 22, 2000	2379207	Guerlain (France SAS)
<b>L'INSTANT DE GUERLAIN</b>	3	Perfume; eau de cologne; toilet waters; perfumed body milks, body lotions, body gels, body oils, and body powders; perfumed soaps; perfumed moisturizing creams; perfumed talcum powder	Aug. 26, 2003	2756404	Guerlain (France SAS)
<b>HABIT ROUGE</b>	3	Eau de toilette, after-shave lotion, personal deodorant, shower gel	Apr. 20, 2004	2834416	Guerlain (France SAS)
<b>INSOLENCE</b>	3	Perfume, perfumery, toilet	Aug. 15,	3129090	Guerlain



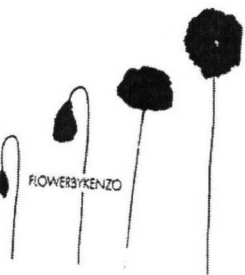

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
		waters	2006		(France SAS)
<b>IDYLLE</b>	3	Perfumery, perfumes, eau de toilette, personal deodorants, cosmetics	Dec. 22, 2009	3729592	Guerlain (France SAS)
	3	Perfumes	May 3, 2011	3953827	Guerlain (France SAS)
<b>LA PETITE ROBE NOIR</b>	3	Perfumery	Jan. 3, 2012	4080150	Guerlain (France SAS)
<b>IMAGINE</b>	3	Perfumes; eau de Cologne; shaving preparations; aftershave balm; body deodorants	Dec. 4, 2018	5620079	Guerlain (France SAS)

### HUBLOT SA, GENÈVE

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>BIG BANG</b>	14	Timepieces and chronometric instruments and parts thereof namely watch cases, watch bands, watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, dress watches, diving watches, movements for clocks and watches, movements for watches	26/09/2006	3149003
 <b>HUBLOT</b>	14	Watches and Clocks and Parts Therefor; Chronometers; Chronographs; Costume Jewelry and Jewelry Made Wholly or in Part of Precious Metals	04/01/1983	1222529
	14	Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch straps, watch cases, dials for clock and watch making, clocks, wall clocks, chronometers and chronographs as watches	08/05/2015	4916069
 <b>UNICO</b>	14	Movements for clocks and watches	17/08/2009	3787659
<b>HUBLOT CLASSIC FUSION</b>	14	Horological and chronometric instruments, namely, watches, wristwatches, watch straps, watch cases, dials for clock-and watch making, clocks, wall clocks, chronometers and chronographs as watches	27/06/2017	5232251
<b>KEY OF TIME</b>	14	Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch bands, watch cases, dials, clocks, wall clocks, chronometers, chronographs	15/05/2012	4140869
<b>KING POWER</b>	14	Jewelry; horological and chronometric instruments, namely, watches, wristwatches, watch bands, dials, clocks, wall clocks, chronometers, chronographs	06/07/2010	3814806
<b>MAGIC GOLD</b>	14	Gold-based alloys and composites thereof and goods made of the aforesaid materials, namely, watches,	3/08/2013	4381674


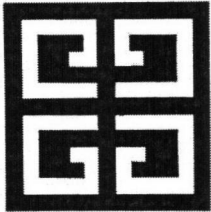

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
		wristwatches, watch straps, dials for clocks-and watch-making, clocks, grandfather clocks, chronometers, and chronographs for use as timepieces, all the foregoing containing gold		
TECHFRAME	14	Jewelry, precious stones; timepieces and chronometric instruments	26/07/2018	5500090
	14	Jewellery; horological and chronometric instruments, namely, watches, wristwatches, watchbands, watch cases, dials, clocks, wall clocks, chronometers, chronographs	24/11/2009	3715561

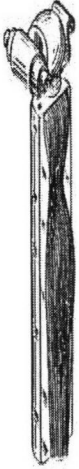
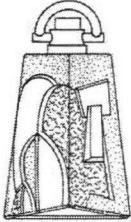
## KENZO

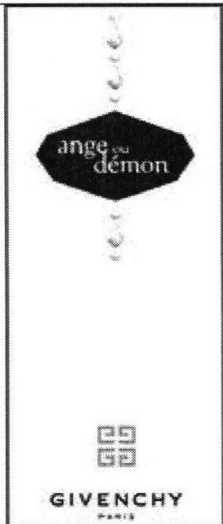
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
KENZO	3	Perfumery	Jan. 8, 1985	1312942
KENZO JUNGLE	3	Perfumery, namely toilet waters, perfumes	Nov. 19, 1996	2017313
	3	Perfumery, namely, toilet water, cosmetics, namely, beauty creams for the face and the body, body lotions	Sep. 10, 2002	2616977
KENZOAMOUR	3	Perfumes; toilet water	June 20, 2006	3106879
UNIDENTIFIED FRAGRANCE OBJECT	3	Perfumery	Aug. 10, 2010	3832756
	3	Perfumery	Nov. 29, 2011	4062441

## LVMH FRAGRANCE BRANDS


<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
GIVENCHY	3	Perfume, toilet water, bath oil, face lotion and talcum powder	Sep. 5, 1972	942407
YSATIS	3	Toilet waters, cosmetic products--namely, perfumed body cream, perfumed body lotion	Aug. 13, 1985	1353577

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>XERYUS</b>	3	Toilet water; personal soaps; personal deodorant	June 23, 1987	1443773
GIVENCHY 	3	Bath soaps; perfumes, toilet water and cologne; lotions and creams for shaving; lotions, milks, creams and gels for the face and body; cosmetic preparations for the bath, namely, - gels, talc and and personal deodorants (deodorant sticks)	May 23, 1989	1539965
	3	Toilet soaps; perfumery; namely, perfumes, eau de cologne and toilet water; cosmetic preparations; namely, lotions, milks, creams and gels for the face and body, lipsticks, nail varnish, makeup foundation and powder, mascara, eye shadow, cosmetic pencils, beauty masks; suntan preparations; namely, gels and creams; cosmetic preparations for the bath; namely, gels, oils, creams, bath salts; deodorants for personal use	June 2, 1992	1689748
<b>AMARIGE</b>	3	Perfume, toilet water, cosmetic products; namely, lotions, milks, creams, gels for face and body, cosmetic preparations for the bath; namely, gels, creams, deodorant for personal use	Sep. 22, 1992	1717361
	3	Toilet water, toilet soap	Apr. 27, 1993	1767120
<b>INSENSE</b>	3	Perfumes, toilet water	Jan. 10, 1995	1872169
<b>TARTINE ET CHOCOLAT</b>	3	Toilet water	Mar. 10, 1998	2142392

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume	Aug. 11, 1998	2180108
<b>ORGANZA</b>	3	Perfume	Aug. 25, 1998	2184436
<b>HOT COUTURE</b>	3	Perfumes, and toilet water, lotions, for the body, body gel	Feb. 13, 2001	2427861
$\pi$	3	Toilet soaps, perfumes, toilet water, deodorants for personal use, after-shave lotions, preparations for hair, namely, shampoos	Sep. 18, 2001	2489772
	3	Toilet water	July 2, 2002	2587049
<b>VERY IRRESISTIBLE GIVENCHY</b>	3	Perfumes, perfumery, toilet waters, lotions for the body; deodorants for personal use	Oct. 24, 2006	3161498
<b>ANGE OU DEMON</b>	3	Perfumes, perfumery, cosmetics	Dec. 18, 2007	3357425

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfumes; eau de cologne and eau de toilette	Jan. 22, 2008	3371362
PLAY	3	Skin care products, namely, aftershave tonics; scented preparations, namely, eau de toilettes, fragrances for personal use	Nov. 3, 2009	3706948
GIVENCHY	3	Perfumery, cosmetics, makeup, non-medicated skin care preparations, non-medicated skin and facial cleaners, skin lightening preparations and non-medicated toiletries	Jan. 3, 2012	4079380

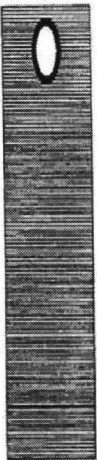
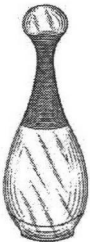

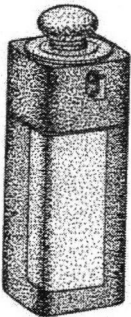
#### LVMH SWISS MANUFACTURES S.A.

<u>Trademarks</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
HEUER (word)	3,569,070	03-Feb-2009	Jewelry; horological and chronometric instruments, namely, watches, watchbands, chronometers, chronographs for use as watches, and clocks in class 14
TAG HEUER	2,281,436	28-Sep-1999	Clocks, watches and parts thereof
	5314173	24-Oct-2017	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication

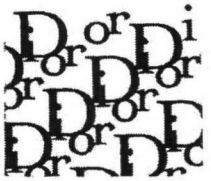
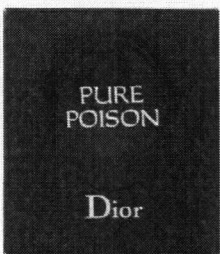
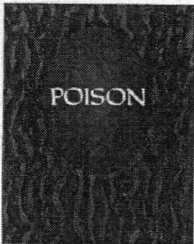
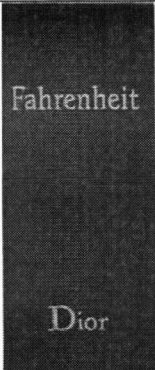
			function; leather boxes adapted for holding watches in class 14
	5314172	24-Oct-2017	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches in class 14
<b>TAG HEUER</b> (word mark)	1304885	21-Mar-2016	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches
<b>TAG HEUER logo</b> (and device)	1471988	12-Jan-1988	Time measuring instruments, namely, electronic stop watches, remote control mini-printer timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers in class 9  Clocks, watches and parts thereof in class 14

## PARFUMS CHRISTIAN DIOR

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>Christian Dior</b>	3 & 5	Face and body creams, skin, face and body powders, lipstick, rouge and filled rouge compacts, perfumes, toilet water	Apr. 21, 1953	573430
<i>Miss Dior</i>	3 & 5	Perfumes, toilet waters, skin creams and lotions	July 14, 1953	577253
<b>DIORISSIMO</b>	3 & 5	Cosmetics and toilet preparations-namely, perfumes, toilet water	July 19, 1960	701515
<b>EAU SAUVAGE</b>		Men's eau de cologne		884294
<b>DIORESSENCE</b>	3 & 5	Perfumes	Jan. 19, 1971	906347
<b>DIORELLA</b>	3	Perfumes, toilet water, eau de cologne	Jan. 8, 1974	976471
<b>POISON</b>	3	Perfumes, eaux de toilette, milks for the care of the body	Nov. 13, 1984	1304580
<b>FAHRENHEIT</b>	3	Perfumes, face creams	Apr. 5, 1988	1482938
<b>DUNE</b>	3	Cosmetics, namely, creams, lotions body, perfumery	Feb. 13, 1990	1582150
<b>DOLCE VITA</b>	3	Perfume, toilet waters	Dec. 31, 1996	2027819
<b>CHRISTIAN DIOR</b>	3	Perfumes, eau de cologne, toilet waters; perfumed body milks, body lotions, body gels, body oils and body powders; perfumed bath and shower gels, perfumed soaps, perfumed moisturizing body creams, personal deodorants for the body; pre-shave and after-shave lotions, shaving foams and gels, emulsions and balms; shampoos, gels and lotions for body, creams, milks, lotions, gels and emulsions for the care of the face, hands and body, cream and gel masks; exfoliating creams, lotions and gels; mascara, eye liner, eye shadow, blush, pressed powder, loose powder, foundation make-up, foundation cream, foundation base, moisturizing cream base, lipstick, nail enamel, base and top coat for nails, nail polish remover, face and eye make-up remover; cleansing milks, gels and lotions for the face	Apr. 28, 1998	2153858

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume, toilet waters, perfumned body milk, perfumed bath and shower foams and gels, perfumed soaps, perfumed moisturizing creams	May 22, 2001	2453926
<b>J'ADORE</b>	3	Perfume and toilet waters	May 29, 2001	2455674
	3	Perfume, eau de parfum spray, toilet water	Jan. 15, 2002	2529417
	3	Perfumes	Apr. 30, 2002	2564970
<b>J'ADORE</b>	3	Perfume, eau de toilette, and milks for the care of the body	Mar. 11, 2003	2696047
<b>HYPNOTIC POISON</b>	3	Perfume, toilet waters, perfumed body milk, perfumed bath and shower foams and gels	Oct. 7, 2003	2771657
<b>FAHRENHEIT</b>	3	Eau de toilette, summer eau de toilette, after-shave, after-shave balm, personal deodorants, shower gels	Mar. 16, 2004	2823387
	3	Perfume, toilet waters	Mar. 23, 2004	2824987



<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
DIOR ADDICT	3	Perfume, toilet waters, lipstick	July 27, 2004	2867329
PURE POISON	3	Perfumery	Aug. 17, 2004	2874846
	3	Perfumery; cosmetics	June 21, 2005	2963354
	3	Perfumes	Oct. 25, 2005	3008784
EAU NOIRE	3	Perfumes	Dec. 27, 2005	3034741
<i>Miss Dior Chérie</i>	3	Perfumes	Apr. 25, 2006	3085164
	3	Perfumes, eau de cologne, eau de toilette, milks, lotions, creams, emulsions, and perfumed gels for body and face care	June 13, 2006	3104002
	3	Perfumery, perfumes, toilet waters	Nov. 28, 2006	3176192
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen preparations, and hair care preparations	Sept. 25, 2007	3297261
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen	Sep. 25, 2007	3297261

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
		preparations, and hair care preparations		
<b>LA COLLECTION PARTICULIERE</b>	3	Perfumes, perfumery, eau de cologne	Oct. 28, 2014	4628811
<b>SAUVAGE</b>	3	Perfumery; toilet water; cosmetics; after-shave lotions; after-shave balms; deodorant for personal use; perfumed gels for the shower	Oct. 10, 2017	5304379

**PRL USA HOLDINGS, INC.**

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
<b>POLO</b>	1,363,459	10/1/85	Clothing-namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats, and dresses.
<b>POLO</b>	1,446,173	7/7/87	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>RALPH LAUREN</b>	1,447,282	7/14/87	Frames for prescription and non-prescription lenses and complete sunglasses.
<b>POLO BY RALPH LAUREN and Design</b>	1,508,314	10/11/88	Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats, belts and socks and ladies' blouses, skirts, suits and dresses.
<b>RALPH LAUREN word mark</b>	1,624,989	11/27/90	Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
<b>RALPH LAUREN</b>	1,835,393	5/10/94	Jewelry.
<b>DOUBLE RL</b>	1,876,705	1/31/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>RRL DESIGN</b>	1,891,143	4/25/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>RRL RALPH LAUREN EST. 1993 and Design</b>	1,932,955	11/7/95	Wearing apparel, namely jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>POLO SPORT</b>	1,951,601	1/23/96	Wearing apparel, namely pants, shorts, jackets, T-shirts, sport shirts, knit shirts, sweatshirts, hats, socks and footwear.
<b>RALPH LAUREN</b>	1,976,324	5/28/96	Clutches, shoulder bags, cosmetic bags, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, circular cosmetic and personal grooming bags, clothing and personal item bags with drawstrings for over the shoulder use, grooming kits in the nature of small traveling bags for carrying personal hygiene items, traveling bags designed for holding suits, tie cases, satchels, purses and other personal item bags with rigid top supports, garment bags for travel, traveling bags for carrying personal items and clothing, coin bags, drawstring pouches, overnight bags, wallets and key holders, all sold empty.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
<b>POLO JEANS CO.</b>	2,049,948	4/1/97	Wearing apparel, namely, jeans, T-shirts, knit shirts, sweatshirts, overalls, blouses, skirts, dresses and hats.
<b>DESIGN ONLY polo player astride horse</b>	2,052,315	4/15/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, pole bags, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>POLO RALPH LAUREN and Design</b>	2,077,082	7/8/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>RALPH</b>	2,175,394	7/21/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>CHAPS</b>	2,137,833	2/17/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>LAUREN</b>	2,246,900	5/25/99	Wearing apparel, namely, topcoats, raincoats, jackets, suit jackets, suit coats, sport coats, sport jackets, blazers, blouses, shirts, shirt jackets, pants, skirts, dresses, sweaters, tee shirts, hats and scarves.
<b>RLX</b>	2,276,536	9/7/99	Wearing apparel, namely, pants, shorts, jackets, coats, woven shirts, T-shirts, knit shirts, sweaters, sweatshirts, blouses, skirts, dresses, hats, footwear, socks, hosiery and gloves.
<b>RL</b>	2,312,818	2/1/00	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, overalls, pants, sweaters, shorts, vests, ties, bathing suits, scarves, hosiery, bodysuits, belts, blouses, skirts, dresses, coats, hats and shoes.
<b>RUGBY</b>	2,339,652	4/11/00	Men's and women's clothing not specifically adapted to be worn while playing rugby, namely, jackets, vests, shirts, sweatshirts, t-shirts, men's shorts and pants, and women's shorts, dresses, blouses, [scarves,] belts and shoes
<b>LAUREN</b>	2,419,959	1/9/01	Handbags, clutches, shoulder bags, tote bags, backpacks, duffle bags, travel bags, suit bags, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>CHAPS</b>	2,505,790	11/13/01	Clothing, namely, sport shirts, sweaters, sweatshirts, t-shirts, shorts, jackets, pants, sport jackets and suits.
<b>RALPH</b>	2,527,823	1/8/02	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>POLO GOLF</b>	2,686,291	2/11/03	Wearing apparel, namely, shirts, sweaters, pants, sweatshirts and t-shirt.

<b><u>Trademark</u></b>	<b><u>Registration No.</u></b>	<b><u>Registration Date</u></b>	<b><u>Goods</u></b>
<b>PINK PONY</b>	3,036,422	12/27/05	Tote Bags, Clothing – namely, sweaters and t-shirts.
<b>RL</b>	3,120,485	7/25/06	Eyeglasses, sunglasses, cases for eyeglasses and sunglasses.
<b>RALPH LAUREN GOLF</b>	3,213,555	2/27/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>RALPH LAUREN TENNIS</b>	3,215,910	3/6/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>RALPH LAUREN SPORT</b>	3,218,130	3/13/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>C (Stylized)</b>	3,225,869	4/3/07	Wearing apparel, namely, sport shirts, knit shirts, sweaters, sweatshirts, t-shirts, blouses, shorts, jackets, pants, jeans, overalls, skirts, dresses, hats, socks and swimwear.
<b>CHAPS</b>	2,137,833	2/17/98	Frames for prescription and non-prescription lenses and complete sunglasses

<b><u>Trademark</u></b>	<b><u>Registration No.</u></b>	<b><u>Registration Date</u></b>	<b><u>Goods</u></b>
<b>PINK PONY</b>	3,245,586	5/22/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
<b>LAUREN JEANS COMPANY</b>	3,254,299	6/19/07	Wearing apparel, namely, jeans, vests, jackets, coats, shirts, sweatshirts, overalls, blouses, skirts, dresses, hats, pants, socks, gloves and footwear.
<b>RL</b>	3,687,528	9/22/09	Handbags, clutches, shoulder bags, tote bags, backpacks, saddle bags, duffle bags, travel bags, suit bags, satchels, hip packs, roll bags, carryalls, garment bags, suit cases, coin purses, drawstring pouches, briefcases, attaché cases, wallets, key cases, billfolds, tie cases, credit card cases, business card cases, grooming kits sold empty, cosmetics and toilet bags sold empty, shaving bags sold empty, and umbrellas.
<b>DESIGN ONLY</b>	4,169,636	7/10/12	Handbag.
<b>POLO</b>	1,532,557	4/4/89	Lotions for use after shaving
<b>RALPH</b>	2,562,975	4/23/02	Eau de toilette, skin and body lotions
<b>LAUREN</b>	1,489,796	5/31/88	Toilet water
<b>RALPH LAUREN</b>	1,222,278	1/4/83	Cologne, aftershave, aftershave balm, antiperspirant, personal deodorant, toilet water, body lotion, bath oil, body powder, perfume
<b>Horse &amp; Polo Rider Design</b>	1,212,060	10/12/82	Cologne, aftershave, aftershave balm, antiperspirant, toilet water
<b>RL</b>	2,891,892	10/5/04	Fragrances, namely, eau de toilette, namely, after-shave splash, after-shave balm
<b>RALPH LAUREN ROMANCE</b>	2,318,372	2/15/00	Eau de parfum
<b>POLO RED</b>	4,506,000	4/1/14	Eau de toilette, after shave preparations, body spray, and personal deodorant
<b>POLO BLUE</b>	2,782,617	11/11/03	Eau de toilette, after shave gel, shower gel, and personal deodorant
<b>POLO SPORT</b>	1,858,094	10/11/94	Toilette water, deodorants
<b>POLO BLACK</b>	3,130,913	8/15/06	Eau de toilette, after shave splash, after shave gel, shower gel, personal deodorant
<b>LAUREN RALPH LAUREN (Stylized)</b>	1,160,547	7/14/81	Cologne, toilet water, body lotion, and perfume
<b>CHAPS</b>	3,358,110	12/18/07	Eau de toilette

(hereinafter collectively referred to as “Plaintiffs’ Federally Registered Trademarks”);

(b) From receiving, manufacturing, distributing, advertising, promoting, returning, offering for sale or otherwise disposing of in any manner, holding for sale or selling any goods, labels, tags, logos, decals, emblems, signs, and other forms of markings, any packaging, wrappers, pouches, containers and receptacles, and any

catalogs, price lists, promotional materials and the like bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

(c) From using any logo, trade name or trademark which may be calculated to falsely represent or which has the effect of falsely representing that the services or products of Defendants are sponsored by, authorized by, or in any way associated with Plaintiffs;

(d) From infringing Plaintiffs' Federally Registered Trademarks;

(e) From falsely representing themselves as being connected with Plaintiffs or sponsored by or associated with Plaintiffs;

(f) From using any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the publicity, promotion, sale, or advertising of goods sold by Defendants including, without limitation, apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and other products bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

(g) From affixing, applying, annexing, or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent such goods as being those of Plaintiffs and from offering such goods in commerce;

(h) From using any trademark or trade name in connection with the sale of any goods which may be calculated to falsely represent such goods as being connected with, approved by or sponsored by Plaintiffs; and

(i) From destroying, altering, disposing of, concealing, tampering with or in any manner secreting any and all business records, invoices, correspondence, books of

account, receipts or other documentation relating or referring in any manner to the manufacture, advertising, receiving, acquisition, importation, purchase, sale or offer for sale, or distribution of any merchandise bearing Plaintiffs' Federally Registered Trademarks.

2. Defendants, their principals, officers, agents, servants, employees and attorneys and all persons in active concert or participation with them are hereby enjoined, from transferring, discarding, destroying or otherwise disposing of the following currently in the possession, custody or control of Defendants:

(a) All merchandise bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom;

(b) All labels, tags, logos, emblems, watch faces, signs, and other forms of markings, all packaging, wrappers, pouches, containers, receptacles, and all advertisements, catalogs, price lists, guarantees, promotional materials and the like bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom, and all plates molds, dies, tooling, machinery, assembly equipment and other means of making the same; and

(c) All books and records showing:

(i) Defendants manufacture, receipt and sale of merchandise bearing Plaintiffs' Federally Registered Trademarks; and

(ii) Defendants' manufacture, receipt and sale of any labels, tags, logos, decals, emblems, signs, and other forms of markings, any packaging, wrappers, pouches, containers and receptacles, and any catalogs, price lists, guarantees, promotional materials and the like bearing Plaintiffs'



Federally Registered Trademarks, either by reference to such trademarks or by style or code number or otherwise.

3. The parties may take immediate and expedited discovery, limited to document requests and interrogatories, without regard to the time limitations set forth in Rules 30, 33, 34 and 36 of the Federal Rules of Civil Procedure.


4. The seizures outlined in the opening paragraph are hereby confirmed, and the counterfeit goods seized pursuant to the Court's Seizure Order may be destroyed after the appropriate 10 days' notice is given to the United States Attorney for the Southern District of New York, as provided for in 15 U.S.C. § 1118.

5. Service of this Order by first-class mail to the Defendants at their business addresses identified in the opening paragraph shall constitute sufficient service of this Order. Service shall be deemed complete on the mailing of this Order as permitted above.

6. All papers under seal in this action are now unsealed.

Dated: January 16, 2020

SO ORDERED:

  
\_\_\_\_\_  
PAUL G. GARDEPHE  
UNITED STATES DISTRICT JUDGE